## Frank Bibeau ATTORNEY AT LAW 51124 County Road 118 Deer River, Minnesota 56636 218-760-1258 or frankbibeau@gmail.com

September 10, 2019

Shelly Jeffers, Court Administrator Becker County Courthouse 913 Lake Avenue Detroit Lakes, MN 56501

Re: <u>Campbell v Honor the Earth</u> Court File No. 03-CV-19-266

Dear Court Administrator,

Please find attached for filing and served upon you DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION TO COMPEL DISCOVERY, AFFIDAVIT OF DEFENDANT'S COUNSEL with Exhibits A & B. I see the Judge issued an order granting the motion to compel yesterday, but . . . Rule 115.04 *Non-dispositive Motions*, subd. (b) provides that the party responding to the motion [to compel to] serve the following documents on all opposing counsel [. . .] and file the documents with the court administrator at least 7 days prior to the hearing, which is presently scheduled for September 25, 2019.

If I can be of further assistance, please call on me or by email. Thank you for your time and consideration.

Best wishes,

Frank Bibeau

/s/ Frank Bibeau

Attorney for Honor the Earth

cc: Christy Hall, Attorney for Campbell